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Attorneys for Plaintiff Jeremy Harkins

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF CALIFORNIA

JEREMY HARKINS

Plaintiff,

v.

SUTTER COUNTY; SUTTER COUNTY'S  
SHERIFF DEPARTMENT;  
CALIFORNIA FORENSICS MEDICAL  
GROUP; TAYLOR FITHIAN, M.D.;  
DORIS BROWN, FNP; SHERILL  
McGUIRE, RN; LISA ROGERS, RN;  
SHERIFF BRANDON BARNES;  
CAPTAIN DAN BUTTLER; SERGEANT  
HERNANDEZ; SERGEANT GARCIA;  
SERGEANT EATON; OFFICER E.  
BROOKS; OFFICER OLSON; OFFICER  
SANTOS; OFFICER WEATHERUP;  
WELLPATH MANAGEMENT, INC.;  
THOMAS PANGBURN, M.D. AND  
DOES 1-50,

Defendants.

Case No.: 2:20-CV-00347-KJM-EFB

**STIPULATION RE DISCOVERY CUT-  
OFF DATES & FUTURE PROCEEDINGS**

IT IS HEREBY STIPULATED by and between the Parties, through their respective  
counsel of record, that the following current discovery cut-off dates and future proceedings of

(1) **Fact Discovery:** March 29, 2021;

(2) **Expert Disclosures:** April 29, 2021;

(3) **Expert Discovery:** June 29, 2021;

(4) **Law and Motion:** July 29, 2021;

(5) **Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by August 30, 2021.

be continued two months, with the new dates being:

(1) **Fact Discovery:** May 29, 2021;

(2) **Expert Disclosures:** June 29, 2021;

(3) **Expert Discovery:** August 29, 2021;

(4) **Law and Motion:** September 29, 2021;

(5) **Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by October 30, 2021.

Good cause exists for this extension as discovery in this case involves numerous depositions, and discovery has been delayed due to the ongoing pandemic. Plaintiffs have also identified four additional defendants.

All parties have also agreed to private mediation with Hon Maria-Elena James, and mediation will be completed in the last week of June 2021.

This is the first request for a discovery cut-off extension.

IT IS SO STIPULATED.

DATED: February 22, 2021

ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/Brian G. Lance

Michael D. Green

Brian G. Lance

Attorneys for Plaintiff

DATED: February 22, 2021

LAW OFFICES OF JEROME M. VARANINI

By: /s/Jerome M. Varanini

Jerome M. Varanini  
Attorneys for Defendants, California  
Forensic Medical Group, Inc.; Wellpath  
Management, Inc.; Doris Brown, Lisa  
Rogers, and Sherril McGuire

DATED: February 22, 2021

BURKE, WILLIAMS & SORENSEN, LLP

By: /s/Gregory B. Thomas

Gregory B. Thomas  
Michael A. Slater  
Attorneys for Defendants Sutter County,  
Sheriff Brandon Barnes, Captain Dan  
Buttler, Sergeant Gloria Hernandez, Sergeant  
Jose Garcia-Cortes, Former Sergeant Lestor  
Eaton, Officer Ethan Brooks, Sergeant  
Kaitlyn Olson, Officer Laurie Helzer, and  
Officer Michael Weatherup

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ORDER

The court grants the parties' request to continue, and sets the following dates:

- (1) **Fact Discovery:** May 29, 2021;
- (2) **Expert Disclosures:** June 29, 2021;
- (3) **Expert Discovery:** August 29, 2021;
- (4) **Law and Motion:** October 8, 2021; and
- (5) **Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by October 30, 2021.

IT IS SO ORDERED.

DATED: February 22, 2021.

  
CHIEF UNITED STATES DISTRICT JUDGE